

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

D-1 Jacob MOSLEY
D-2 Bethani WINTERS

Case: 2:20-mj-30500
Judge: Unassigned,
Case No. Filed: 12-03-2020 At 02:16 PM
USA v. JACOB MOSLEY(1),
BETHANI WINTERS(2)(CMP)
(MLW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 23, 2020 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

21 U.S.C. § 841(a)(1) and 846

Offense Description

Possession with intent to distribute controlled substances and conspiracy to possess with intent to distribute controlled substances.

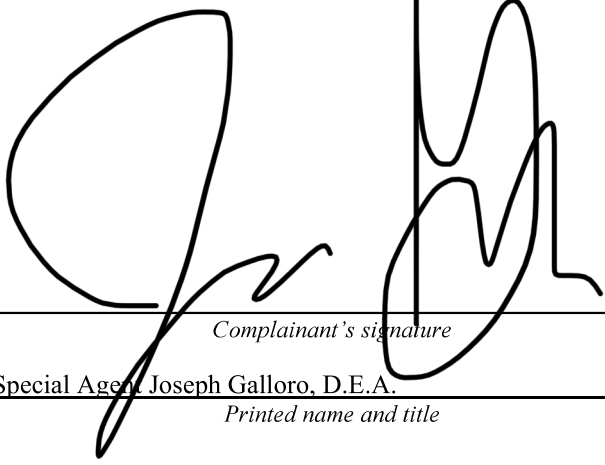
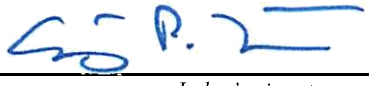
This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: December 3, 2020

City and state: Detroit, Michigan


Complainant's signature
Special Agent Joseph Galloro, D.E.A.
Printed name and title

Judge's signature
Hon. Anthony P. Patti, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Joseph Galloro, having been duly sworn, depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the United States Drug Enforcement Administration (“DEA”), United States Department of Justice. I was sworn-in on or about October 2020. I have been assigned to the DEA Detroit Field Division, Detroit, Michigan. Prior to joining the DEA, I was employed with the Monroe County Sheriff’s Office in Monroe, Michigan, from October 2013 to February 2020. I first held the position of Corrections Officer, then Sheriff’s Deputy, and finally Detective, assigned to the Monroe Area Narcotics Team and Investigative Service (MANTIS).

2. As a DEA Special Agent, I investigate criminal violations of the federal narcotics laws, including, but not limited to, Title 21, United States Code, Sections 841, 843, 846, and 848. I received special training in the enforcement of federal controlled substance laws and specialized classroom instruction on narcotics smuggling, money laundering investigations, conspiracy, and complex investigations. I have experience in various types of electronic surveillance, the debriefing of defendants, witnesses and informants, as well as others who have knowledge of the distribution and transportation of controlled substances, the

laundering and concealing of proceeds from drug trafficking and the street gangs who participate in these illegal activities.

3. As a result of these investigative activities, I have conducted and participated in numerous investigations as a DEA Special Agent and detective that have resulted in the seizure of marijuana, prescription pills, synthetic drugs, cocaine, methamphetamine, and heroin.

4. This affidavit is submitted in support of a complaint for Jacob MOSLEY and Bethani WINTERS. Probable cause exists that, on November 24, 2020, MOSLEY and WINTERS violated 21 U.S.C. §§ 841(a)(1) and 846, possession with intent to distribute a controlled substance and conspiracy to possess with intent to distribute a controlled substance.

5. I reviewed MOSLEY's criminal history. MOSLEY has the following felony convictions, punishable by more than one year in prison: 2012, Armed Robbery, Third Judicial Circuit Court, Wayne County.

SUMMARY OF THE OFFENSE

6. On November 24, 2020, law enforcement conducted a parole compliance check on Jacob MOSLEY alongside the Michigan Department of Corrections (MDOC). The compliance check occurred at 1605 Queens Ct Apt. G, Monroe, Eastern District of Michigan. MOSLEY is on parole and supervised by MDOC Agent Ryan Cosgrove. MOSLEY has a court ordered search clause as part of his parole conditions. The search clause allows, in part, an MDOC agent and

law enforcement to search MOSLEY's room. MOSLEY was found in the upstairs northeast bedroom with Bethani WINTERS. The following was found in the upstairs Northeast bedroom:

- a. Approximately 318.4 gross grams of suspected crack cocaine in packaging material (in the closet in a pink Michael Kohr's back pack);
- b. Approximately 32.3 gross grams of suspected heroin in packaging material (in the closet in a pink Michael Kohr's back pack);
- c. Digital scales and packaging material (in the closet in a pink Michael Kohr's back pack);
- d. Packaging material (in a "Lebron XVII" shoebox);
- e. Three cell phones; and
- f. A quantity of United States currency found throughout the bedroom. The currency was bank wrapped and also wrapped with rubber bands.

7. The suspected crack cocaine and heroin was packaged for sale and/or distribution. Based on my training and experience, narcotic traffickers will use digital scales to weigh out amounts to sell and packaging material to prepare the drugs for sale and/or delivery.

8. The suspected crack cocaine was field tested with a positive result for crack cocaine. The suspected heroin was field tested with a positive result for heroin.

9. WINTERS was advised of her Miranda Warnings, agreed to answer questions, and made the following statements:

a. MOSLEY is her boyfriend and they have been living at 1605 Queens Court, Apartment G, for approximately two months;

b. She knew MOSLEY was still involved in selling narcotics when they started dating;

c. Together, they sell crack cocaine and heroin;

d. They last sold narcotics on November 23, 2020;

e. They break up the crack in the bedroom and put it into packages;

f. She goes with MOSLEY to pick up the heroin; and

g. She will sometimes drive and sometimes ride in the car with MOSLEY when they go out to sell the drugs.

10. MOSLEY was advised of his Miranda Warnings, agreed to answer questions, and stated the following:

a. The drugs in the Michael Kors bag was his; and

b. The drugs were in the room on the table when Agent Cosgrove knocked on the door. MOSLEY put the drugs in the pink Michael Kors bag.

CONCLUSION

11. Probable cause exists that Jacob MOSLEY and Bethani WINTERS violated 21 U.S.C. §§ 841(a)(1) and 846, possession with intent to distribute a controlled substance and conspiracy to possess with intent to distribute a controlled substance.



Special Agent Joseph Galloro
Drug Enforcement Administration

Sworn to before me and signed in my
presence and/or by reliable electronic means.



HON. ANTHONY P. PATTI December 3, 2020
UNITED STATES MAGISTRATE JUDGE